

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTON PERAIRE-BUENO, and JAMES
PERAIRE-BUENO,

Defendants.

Case No.: 1:24-cr-00293-JGLC

**DECLARATION OF KATHERINE TREFZ IN SUPPORT OF DEFENDANTS' JOINT
MOTION TO COMPEL EXPERT DISCLOSURES**

I, Katherine A. Trefz, declare as follows:

1. I am a partner at Williams & Connolly LLP, counsel to Defendant James Peraire-Bueno in the above-captioned action. I am over eighteen years of age and am competent to testify herein. I make the following statements based on my personal knowledge.

2. Pursuant to Local Criminal Rule 16.1, I certify that the parties conferred via letter, email, and phone regarding the Motion to Compel and the Letter Motion for Interim Relief, as described in paragraphs 4-8 of this declaration.

3. The government's expert disclosures were served via electronic means at approximately 10:38pm EST on Friday, June 27, 2025. Exhibit A to the motion is a copy of the government's expert disclosure, except for the exhibits which are not the subject of the motion.

4. At 11:00am EST on Monday, June 30, 2025, I sent a letter to counsel for the government identifying the deficiency in the government's expert disclosures that is the subject of the Motion to Compel. Given the Peraire-Buenos' July 18, 2025 disclosure deadline, the letter

informed the government of the Peraire-Buenos' need for a quick response and offered to confer. Exhibit B to the motion is a copy of that letter.

5. The government initially responded that with the holiday and travel schedules, the government team was unavailable to confer this week and asked to defer any conferral to the week of July 7. In response, I explained that given the Peraire-Buenos' disclosure deadlines, we believed that a motion should be filed this week if one was necessary. The government offered a conferral on Wednesday, July 2, 2025, at 4:30pm EST.

6. The parties conferred on Wednesday, July 2, 2025, for approximately 40 minutes. In addition to discussing the substance of the parties' arguments, the parties discussed a proposal whereby, in exchange for an agreement to a 1-week abeyance in their disclosure deadline, the Peraire-Buenos would not file the Motion or Letter Motion this evening and instead would allow the government until Sunday, July 6 to decide whether it would provide interview memos for the relevant witnesses as a way to resolve the Peraire-Buenos' most pressing concerns. The parties also discussed what further proceedings might occur if this approach were taken. The parties ended the call by agreeing to confer internally and communicate their positions via email.

7. After the call, I reiterated by email the offer to defer filing this motion to allow further consideration by the government in exchange for an agreement that the Peraire-Buenos' responsive disclosures would be held in abeyance for one week so the Peraire-Buenos were not further prejudiced by providing this professional courtesy. I understand from the government's response that it has rejected this offer.

8. I understand from the government's response that it would like to have further discussion on the substance of the parties' arguments. From the conferral today, it does not appear that a further conversation as to the merits of the parties' positions would be fruitful. In

any event, counsel for the Peraire-Buenos explained to counsel for the government that given their pending deadlines, the Peraire-Buenos cannot wait to seek relief without an abeyance of those deadlines.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

EXECUTED on this 2nd day of July, 2025, in Washington, D.C.

By: /s/ Katherine Trefz

Katherine Trefz